

2018 Assessor Checklist
EPA QA Field Activities Procedure [CIO 2105-P-02.0]

Region/Office Division/Unit name and location:

Date(s) of Assessment:

Name(s)/Affiliation of Assessor(s):

The following requirements are taken from the QAFAP Section 6 Procedure:

General Requirement	Assessment			Source	Assessor Comments
	Y ✓	N ✗	NA ✓		
6.1 Personnel and Training					
6.1.1 Personnel responsible for field activities shall have appropriate qualifications, education, training, experience and a satisfactory knowledge of the requirements of the activities to be carried out. These requirements include, but are not limited to, health and safety training and program specific inspector training.				R6PROC-001-R0, 2.1	
6.1.2 Field groups shall have a documented system to ensure that up-to-date records of training are maintained for field personnel. These records shall include external or internal courses attended and relevant training received, including on-the-job training. For credentialed employees, training records will be maintained to document personnel compliance with EPA Order 3500.1 A1, EPA Order 1440.2, and field-related requirements.				R6PROC-001-R0, 2.1	
6.1.3 Records shall be sufficiently detailed to document that personnel performing particular tasks have been properly trained and that their subsequent ability to perform these tasks has been formally evaluated.				R6PROC-001-R0, 2.4.2	
6.1.4 Training records shall be maintained consistent with Agency records retention schedules.				R6PROC-001-R0, 2.5 R6PROC-003-R0, 2.1	

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6.2 Document Control Within the context of field activities and this Procedure, controlled documents are generated internally for each organization and describe how work will be conducted. Examples of controlled documents include policies, standard operating procedures (SOPs), SOP compendiums, guidance, blank template forms, checklists and work instructions pertaining to inspection planning, environmental sampling and standard inspection techniques.					
6.2.1 Field groups shall maintain a system for the control of all documents relating to their activities including the preparation, review, approval, issuance, revision, revocation and archiving of documents. Procedures shall be developed that ensure:				R6PROC-002-R0, 2.1	
a) All controlled documents are reviewed and approved for use by authorized personnel prior to issue. Review of the controlled documents by various subject matter experts and users is documented;				R6PROC-002-R0, 2.3	
b) Controlled documents include a unique document control identifier/number and all revisions are clearly identified;				R6PROC-002-R0, 2.2	
c) All controlled documents are current and accurate;				R6PROC-002-R0, 2.2	
d) Current versions of appropriate documents are available at all relevant locations;				R6PROC-002-R0,	
e) Periodically, documents are reviewed and, where necessary, revised to ensure continuing suitability and compliance with applicable requirements;				R6PROC-002-R0, 2.6	
f) Superseded documents are removed from use throughout the organization but archived and readily accessible for a determined period consistent with EPA records management schedules;				R6PROC-002-R0, 2.7	
g) Revisions to documents are reviewed and approved by the same functional position that performed the original review unless specifically designated otherwise;				R6PROC-002-R0, 2.6	
h) Where practicable, the revised or new text is identified in the document.				R6PROC-002-R0, 2.6	
6.2.2 Briefings and/or training on the information presented in controlled documents shall be provided for users.				R6PROC-002-R0, 2.4	
6.2.3 There shall be a system for managing and distributing controlled documents so that only current versions of the documents are available for use.				R6PROC-002-R0, 2.5	

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6.3 Records Management					
6.3.1 Field groups shall maintain a records management system to suit their particular circumstances and to comply with applicable Federal and Agency records management regulations, policies, and retention schedules.				R6PROC-003-R0, 2.1	
6.3.2 Within the context of field activities and this Procedure, records provide objective evidence of actions taken and observations made. Examples of field records include (but are not limited to): field logbook entries, pH strip chart recordings, electronic field measurement data log, completed chain of custody forms, photographs, maps, completed forms, QAPP, reports, etc.				R6PROC-003-R0, 2.2, 2.3	
6.3.3 Field groups shall establish and maintain procedures that ensure:					
a) All records are legible and stored and retained in such a way that they are readily retrievable, either electronically or in hard copy format;				R6PROC-003-R0, 2.7	
b) All records are held secure and in confidence, consistent with Agency policies and procedures for maintenance of enforcement-related ¹ documents, when applicable;				R6PROC-003-R0, 2.7, 2.11	
c) Observations, calculations, and measurement entries shall be clearly and permanently recorded at the time they are made;				R6PROC-003-R0, 2.2	
d) Technical records associated with field activities include the identity of personnel responsible for the sampling or inspection activities;				R6PROC-003-R0,	
e) Each page of project-related records is traceable back to the project;				R6PROC-003-R0, 2.2	
f) Information that is to be included in files that contain project records is defined;				R6PROC-003-R0, 2.3	
g) Electronic records have back-up processes and protection from unauthorized access or amendment;				R6PROC-003-R0, 2.8	
h) Records that have been recorded manually are recorded in permanent ink. When weather conditions do not make it feasible to use permanent ink, then entries can be made in non-smear pencil. The penciled entries shall be captured permanently by photocopying or photographing the penciled entries, or other acceptable manner;				R6PROC-003-R0, 2.2	
i) Error corrections do not obliterate entries in the original record. Corrections shall be made by marking through the error with a single line then initialing and dating the correction.				R6PROC-003-R0, 2.2	

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6.4 Sampling and Environmental Data Management					
<p>Within the context of field activities and this Procedure, as defined by EPA's Quality Policy (CIO 2106.0), environmental data includes any measurements or information that describe environmental processes, locations, or conditions; ecological or health effects and consequences; or the performance of environmental technology. For EPA, environmental data include information collected directly from measurements, produced from models, and compiled from other sources such as databases or literature. This includes, but is not limited to, observations, environmental media samples (water, sediment, soil, waste, etc), measurements, or documentation, such as field notes, instrument charts, laboratory reports, photographs, or technical reports obtained/created during a field investigation or inspection.</p>					
<p>6.4.1 Field groups shall establish and maintain procedures for the identification, transportation, handling, protection, storage, and retention of samples and other appropriate environmental data during field activities.</p> <p>The procedures shall ensure:</p>				R6PROC-004-R0	
<p>a) Field samples and appropriate environmental data are maintained under custody at all times during field studies, investigations, and inspections.</p> <p>Samples and data are in custody if they are:</p> <ul style="list-style-type: none"> i) Within the direct possession or the control (i.e., within the view) of an individual designated to have sample handling responsibilities; or ii) Placed in a designated secure area to prevent tampering; or iii) Maintained in a manner that ensures the integrity of the samples is not compromised, when placed in an unsecure area. 				R6PROC-004-R0, 3.2	
<p>b) All samples, measurements, and other appropriate data shall be uniquely identified to ensure items cannot be confused physically or when referred to in records or other documents.</p>				R6PROC-004-R0, 2.2.1	
<p>c) A chain of custody record shall be maintained for the collection of environmental samples which details each person who takes possession of the samples.</p>				R6PROC-004-R0, 3.3.3	
<p>d) If electronic systems (i.e., bar coding of potential evidence/samples, Scribe, etc.) are used for sample labeling or chain of custody generation, hardcopy/manual systems should be available in the event of failure of the primary electronic system or device.</p>				R6PROC-004-R0, 5	
<p>6.4.2 For organizations that collect potential evidence for enforcement purposes, custody and sample security procedures must be in place and documented to demonstrate sample and data tampering did not occur (for example, samples placed within containers that have been secured with custody seals) from the time the potential evidence is collected until introduced into legal proceedings.</p>				R6PROC-004-R0, 3.3.2	

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6.5 Field Documentation					
6.5.1 Field groups shall establish and maintain procedures to document field activities. The documentation procedures shall ensure that:				R6PROC-005-R0	
a) Field activities are thoroughly documented;				R6PROC-005-R0, 2.1	
b) Field documentation contains facts and objective observations;				R6PROC-005-R0, 2.1	
c) Observations and/or data which are obtained in the course of inspections are recorded contemporaneously, when observed or collected, to prevent a loss of information;				R6PROC-005-R0, 2.2	
d) Documentation consists of individual photographs, video and other audio-visual materials collected during inspections and field activities. Recommended procedures are outlined in Digital Camera Guidance for EPA Civil Inspections and Investigations, U.S. EPA Office of Compliance, OECA, July 2006.				R6PROC-005-R0, 2.3.6	
e) The following information shall be included in all field documentation:					
i) Project/facility or field study name				R6PROC-005-R0, 2.3.1	
ii) Project/facility or field study location				R6PROC-005-R0, 2.3.1	
iii) Project/inspection or field study leader				R6PROC-005-R0, 2.3.1	
iv) Project/inspection or field study team members				R6PROC-005-R0, 2.3.1	
v) Project/inspection or field study dates				R6PROC-005-R0, 2.3.1	

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6.5.2 When logbooks are used to document field activities, the documentation will be in a dedicated, bound logbook with sequentially numbered pages. If bound field logbooks cannot be used, then the field group should make provision for the notes to be bound, such as binding loose leaf data sheets, prior to going in the field. When electronic field documentation is utilized, such as electronic notebooks or PDAs, then provisions must be made to document the above mentioned items within the notes and to back-up the notes. The original data must be backed up to another media, such as a laptop computer, USB drive, or CD prior to leaving the site, when possible. It is recommended that the data shall be backed up on at least a daily basis and preferably more frequently when field notes and/or measurements are recorded electronically				R6PROC-005-R0, 2.1	
6.5.3 ¹ For field measurements and sample collection, documentation shall include as appropriate, but not be limited to:					
a) Date and time of measurement or sample collection				R6PROC-005-R0, 2.3.2	
b) Location description and/or global positioning system (GPS) coordinates				R6PROC-005-R0, 2.3.2	
c) Measurement/Sample identification				R6PROC-005-R0, 2.3.2	
d) Measurement/Sample collection method				R6PROC-005-R0, 2.3.2	
e) Measurement/Sample collection equipment used, including identification numbers and the manufacturer name/model number, as appropriate				R6PROC-005-R0, 2.3.2	
f) Calibration standards, buffers, etc. including manufacturer, lot numbers, and expiration date				R6PROC-005-R0, 2.3.2	

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g) Initial and continual calibration data and meter end checks				R6PROC-005-R0, 2.3.2	
h) Measurement values for non-logging equipment.				R6PROC-005-R0, 2.3.2	
i) Sample containers (number and type)				R6PROC-005-R0, 2.3.2	
j) Sample preservation (chemical, ice, etc.)				R6PROC-005-R0, 2.3.2	
k) Physical description of matrix measured or sampled				R6PROC-005-R0, 2.3.2	
l) Maps/sketches				R6PROC-005-R0, 2.3.2	
m) Conditions that may adversely impact the quality of measurements/samples, if applicable (for example, rain, wind, smoke, dust, extreme temperatures, etc.)				R6PROC-005-R0, 2.3.2	
n) Photograph log				R6PROC-005-R0, 2.3.2	

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6.6 Field Equipment					
Field groups shall establish and maintain procedures for field equipment that ensure:					
a) All measurement equipment is uniquely identified (i.e., identification number);				R6PROC-006-R0, 2.1.1	
b) Procedures established by the manufacturer and field staff are followed to ensure measurement equipment is properly maintained and calibrated;				R6PROC-006-R0, 2.1.1	
c) Measurement equipment is calibrated before being put into service and thereafter according to an established procedure;				R6PROC-006-R0, 2.1.3	
d) Calibration records for each piece of measurement equipment are maintained;				R6PROC-006-R0, 2.1.1, 2.1.3	
e) Up to date instructions on the use and maintenance of measurement equipment, including any relevant manuals provided by the manufacturer of the equipment, are readily available for use by the appropriate personnel;				R6PROC-006-R0, 2.1.1, 2.1.2	
f) Equipment records are established for measurement equipment that include at least the following:					
i) the identity of the equipment and its software, if applicable,				R6PROC-006-R0, 2.1.1	
ii) the manufacturer's name;				R6PROC-006-R0, 2.1.1	
iii) the equipment's serial number or other unique identifier;				R6PROC-006-R0, 2.1.1	

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iv) the manufacturer's instructions or a reference to their location;				R6PROC-006-R0, 2.1.1	
v) dates, results and copies of reports and certificates of all calibrations and the due date next calibration;				R6PROC-006-R0, 2.1.1	
vi) any damage, malfunction, modification or repair to the equipment; and				R6PROC-006-R0, 2.1.1	
vii) each project the item is used on and a record of sign-in and sign-out.				R6PROC-006-R0, 2.1.1	
g) Equipment that has been shown to be defective or outside specified quality control limits is taken out of service. Such equipment shall be isolated to prevent its use and clearly labeled/marked as being out of service until it has been repaired and shown by calibration or test to perform correctly;				R6PROC-006-R0, 2.1.2	
h) Whenever practicable, equipment requiring calibration shall be labeled, coded or otherwise identified to indicate the status of calibration including the date when calibration is due. The date when last calibrated may also be included.				R6PROC-006-R0, 2.1.3	
i) Records shall be maintained to document the standards, reagents, etc. used to calibrate equipment and shall contain (at a minimum): the manufacturer, the standard/reagent lot number, and the expiration date of the standard/reagent; and				R6PROC-006-R0, 2.1.1	
j) ¹ If possible, field groups shall have an individual designated with overall responsibility for on-going field equipment maintenance, facilitating equipment repairs, etc. either conducted in-house or through established service contracts/vendors.				R6PROC-006-R0, 2.1.2	

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6.7 Field Inspections and Investigations					
6.7.1 Field groups shall establish and maintain procedures for the planning of field investigations, including inspections. The procedures shall take into consideration all applicable Agency and program-specific requirements.				R6PROC-007-R0	
6.7.2 Field sampling and measurement activities shall be conducted in accordance with applicable SOPs, quality assurance project plans and sampling and analysis plans.				R6PROC-007-R0, 2.2.1	
6.7.3 All instructions, standards or written procedures, worksheets, check lists and reference data, relevant to the field investigations/inspections, shall be current, accurate and readily accessible by the staff.				R6PROC-007-R0, 2.2	
6.8 Reports					
6.8.1 Field groups shall establish and maintain a procedure for the preparation of a written report to summarize results of routine field activities, including compliance inspections or as in the case of many field studies, a peer reviewed publication.				R6PROC-008-R0	
6.8.2 Each report shall include at least the following information unless there are valid reasons for not doing so, such as publication in a peer reviewed journal:					
a) report title;				R6PROC-008-R0, 2.1	
b) name of the organization preparing the report;				R6PROC-008-R0, 2.1	
c) name of the customer;				R6PROC-008-R0, 2.1	
d) sample/measurement/inspection results;				R6PROC-008-R0, 2.1	
e) name, title and signature of the individual authorizing the report;				R6PROC-008-R0, 2.1	
f) details of any environmental conditions during the field investigation that may affect the interpretation of the report results.				R6PROC-008-R0, 2.1	

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6.9 Internal Audits					
6.9.1 Field groups shall periodically conduct internal audits to verify that their operations comply with this procedure.				R6PROC-009-R0	
6.9.2 The personnel performing the audits shall be qualified and independent from the functions being audited, whenever possible.				R6PROC-009-R0, 2.1.1	
6.9.3 The roles and responsibilities of management and staff for planning, implementing and reporting of internal audits (including the need for corrective actions) shall be described in a procedure.				R6PROC-009-R0, 2.1.2	
6.9.4 Internal audit reports shall specify which implemented program(s) were audited and the results including positive findings and findings which require corrective action.				R6PROC-009-R0, 2.3	
6.10 Corrective Action					
6.10.1 Field groups shall establish and maintain a procedure for addressing findings from internal audits through corrective actions whenever nonconformities with this Procedure are identified. The roles and responsibilities for management and staff in the corrective action process shall be specified.				R6PROC-009-R0, 2.5	
6.10.2 The procedure shall include an investigation to determine the root cause(s) of the problem. Corrective actions shall be commensurate with the magnitude and the risk of the finding.				R6PROC-009-R0, 2.5	
6.10.3 Field groups shall document and implement any required changes resulting from corrective actions.				R6PROC-009-R0, 2.5	

CHECKLIST AUTHOR: _____ MAIL CODE: _____ DATE: _____

CHECKLIST REVIEWER: _____ MAIL CODE: _____ DATE: _____

¹ Three editorial changes were made for the checklist to correct minor errors in the QAFAP. These changes include: 1) removed the extraneous word “shall” in Section 3.3.b, 2) changed the second Section 6.5.2 to 6.5.3, and 3) added a “j” identifier to the last sentence in Section 6.6 that was inadvertently dropped off during the publishing of the QAFAP.